



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO REQUESTED RELIEF FROM INSERVICE INSPECTION REQUIREMENTS

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.

INDIAN POINT NUCLEAR GENERATING UNIT NO. 2

DOCKET NO. 50-247

INTRODUCTION

As required by 10 CFR 50.55a(g), the Indian Point Nuclear Power Station, Unit 2, Inservice Inspection (ISI) of ASME Code Class 1, 2 and 3 components shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda. However, 10 CFR 50.55a(g)(6)(i) authorizes the Commission to grant relief from ASME Code requirements upon making the necessary findings.

By letters dated May 11, 1984 and July 30, 1984, Consolidated Edison Company of New York, Inc. (the licensee) proposed that hydrostatic testing criteria for certain designated components and that the basis for extension of the ISI ten year interval be changed to provide relief from specific requirements of the ASME Code Section XI, 1974 Edition, Summer 1975 (S75) Addenda. Because the licensee has commenced the second ten year interval, this review has the effect of examining aspects of the first ten year inspection interval which were found to be impractical by the licensee.

Code Relief Request

Pursuant to 10 CFR 50.55a(g)(5)(iii), relief is requested from performing the hydrostatic pressure test of certain components to the rules of the ASME Code, Section XI, 1974 Edition Summer 1975 Addenda (74/S75). These relief requests, identified as requests A to E and L to O in the licensee's letters, have the main effect of providing a change to certain of the hydrostatic pressure testing details from the 1974 Edition/S75 Addenda requirements to those in 1980 Edition/Winter 1981 Addenda. Relief Request F addresses pressure testing of a portion of the Auxiliary Cooling Water (ACW) line at a pressure lower than that required by the governing Code and Request P proposes a change to the basis for extending the ISI ten year interval.

Proposed Alternative Examination

The licensee proposal for relief requests A, B, C, D, E, L, M, N, and O is to apply the corresponding hydrostatic pressure test rules of the ASME Code Section XI, 1980 Edition/Winter 1981 Addenda to the affected components.

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Relief Request "F" provides the alternative of conducting the hydrostatic pressure test on a portion of the ACW line at its nominal operating pressure. Relief Request P proposes to substitute the rules of Section XI 80/W81 in place of 74/S75 for the purposes of extending the first ten year ISI interval.

#### Evaluation Including Discussion

The licensee submittals of May 11, 1984 (A to F) and July 30, 1984 (L to P) were included in this review and are part of the basis for the staff's evaluation. The staff agrees with the licensee that for the above relief requests the 74/S75 Code pressure testing rules are impractical. At the time of the submittals, the Inservice Inspection (ISI) program was in the final portion of the first ten year ISI interval with the ASME Code Section XI to the Summer 1975 addenda being applicable. The second 10 year interval which is presently in progress is in accordance with the ASME Code Section XI, Winter 1981 Addenda as required by 10 CFR 50, part 50.55(a). Relief requests A, B, C, D, E, L, M, N, and O in effect provide for certain ISI pressure testing to be accomplished in accordance with the ASME Code applicable to the second ten year ISI inspection interval. The relief request "F" identifies the condition that the auxiliary cooling water system supply header and discharge header may not be isolated for pressure testing above nominal operating pressure and therefore requests relief to accomplish pressure testing of this portion of the line at operating pressure. The granting of Relief Request P brings the first and second ten year intervals of the ISI program under the same rules for the purpose of extending an interval should this be required.

During the course of this review, the staff identified, and subsequently confirmed with the licensee, the existence of typographical errors in both the May 11, 1984 and July 30, 1984 licensee letters. These errors occurred in relief requests F and N and involved reference to paragraph IWC-5200 or IWC-5220 of the code where the reference should have been to section IWD-5200(a). The staff considered the corrected versions of these two relief requests during its review.

#### Conclusion

The staff verified that these relief requests are consistent with requirements of 10 CFR 50.55a and the acceptance criteria of NUREG-0800 (Standard Review Plan) Chapter 5, Section 5.2.4 for Reactor Coolant Pressure Boundary Inservice Inspection and Testing and Chapter 6, Section 6.6 for Inservice Inspection of Class 2 and 3 components. Based on the review summarized herein, the staff has concluded, then, that the relief requested and the alternative examination imposed through this document gives reasonable assurance that an acceptable level of quality and safety intended by the ASME Code will be maintained. Additionally, we have concluded that this relief does not involve a significant increase in the probability or consequences of accidents previously considered and does not involve a significant decrease in a safety margin. The staff grants the relief as requested by the licensee for the Section XI Code requirements that have been determined to be impractical in the attached relief requests A to P and imposes the alternate examinations or provisions in the subject relief requests.

We have also concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations, and the issuance of this relief will not be inimical to the common defense and security, or to the health and safety of the public.

Date:

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